

August 17, 2001

Mr. Robert J. Whiting  
Chief, Regulatory Branch  
St. Paul District, Army Corps of Engineers  
190 Fifth Street East  
St. Paul, MN 55101-1638

RE: 94-01298-IP-DLB

Dear Mr. Whiting:

Thank you for the opportunity to comment on the draft Coordination Plan for Preparation of the Crandon Project Environmental Impact Statement, dated July 13, 2001 and received on July 17, 2001. Having such a plan does assist us and other EIS participants better understand when and where our resources will be needed.

In reviewing the draft Coordination Plan, I offer several comments for your consideration:

Cooperating Agencies and Tribal Trust Responsibilities:

1) In a letter dated August 10, 2001 from Acting Regional Administrator David Ullrich to the Colonel Kenneth Kasprisin, the EPA accepted the COE's request to become a cooperating agency for the Crandon Mine EIS. We look forward to developing a memorandum of understanding with you and to continue working with you on this project.

Corps-Prepared Documents and Review Time Frames:

2) Table 1 identifies the EIS documents that will be prepared by the COE and the time offered for providing comment to the COE. It is understood that tight time frames for the reviews are needed to keep the progress of the EIS moving forward. To help facilitate comments being received on schedule, I suggest that meetings and/or conference calls also be set during each of these review time periods. This draft Coordination Plan does not mention anything about such meetings or calls. This would hopefully help reduce delays and produce more direct, and less repetitive comments. In addition, updates of the schedule (especially the tentative date of the availability of the documents) should be provided during the monthly COE/EIS Participant Conference Calls. Once comments are made on draft documents, will the COE respond to each commentor on how the comments were or will be addressed? Will all the comments received be shared with all other reviewers? Will additional time be provided to the EIS reviewers to review revised draft documents? For instance if a significant amount of comments are received on a

particular draft EIS chapter, will the COE make the re-draft available for an additional 30 days of comment?

3) Table 2 identifies other technical documents that will be prepared by the COE, and the time offered for providing comment to the COE. While not yet produced, EPA hopes that an HSPF model report will also become part of the EIS review. Periodic draft reports should be available for COE and other participant review throughout the next year.

4) The paragraph beneath Table 2 states that some of the review time periods for the documents within Table 2 may overlap. This overlap may be cause for the time frames as outlined, to be extended. Limited review resources, especially for the Tribes, may limit the amount of review that can be performed if too many documents are received within a short time period. In addition, changes made to one document, may be cause for a related document or EIS chapter to be revised and therefore, more review time may be needed to coordinate these reviews.

Public and Tribal Hearings:

5) In addition to comments regarding additional scoping meetings, as made in other correspondence to the COE, it may serve the public interest to host a meeting updating the public on the overall process before the draft reports and EIS chapters start to roll in for review. This meeting would not be a scoping meeting or a hearing, but an update/informational meeting to keep the public informed of the process and status of the work. EPA could assist the COE in such a meeting if it were to occur.

Timeliness of EIS Preparation:

6) In order to help speed up the reviews of the draft EIS documents within the EPA, I am requesting that Mr. Al Fenedick, Office of Strategic Environmental Analysis, be added to the cc' list in addition to myself. Al will be the prime coordinator for the EIS review for the EPA. His address is as follows: U.S. Environmental Protection Agency, 77 W. Jackson Blvd., Mail Code B-19J, Chicago, IL 60604.

We look forward to receiving the listed documents and providing the COE with comments.

If you have any questions or concerns regarding the above comments, please feel free to call me at 312-886-7252.

Sincerely,

Daniel J. Cozza, Crandon Mine Project Manager  
U.S. Environmental Protection Agency